

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 23-cv-21377-DPG

DONALD J. TRUMP,

Plaintiff,

vs.

MICHAEL D. COHEN

Defendant.

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**DEFENDANT’S UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES**

Defendant Michael D. Cohen, by and through undersigned counsel, moves on an unopposed basis for leave to exceed the page limitation of Local Rule 7.1(c) for his forthcoming motion to dismiss Plaintiff’s Complaint.

The 32-page Complaint raises a host of complex factual and legal issues. To sufficiently address these issues, Defendant requires up to 35 pages for his motion to dismiss and incorporated memoranda of law, which exceeds the presumptive 20-page limit under Local Rule 7.1(c). Defendant has conferred with Plaintiff’s counsel who represents that Plaintiff has no objection to the relief sought in this motion.

WHEREFORE, Defendant respectfully requests that this Court grant him leave to file a motion to dismiss and incorporated memoranda of law that does not exceed 35 pages.

**LOCAL RULE 7.1(a)(3) CERTIFICATE OF CONFERRAL**

The undersigned certifies that he has conferred with counsel for the Plaintiff in a good faith effort to resolve the issues raised in this motion. Counsel for the Plaintiff stated that he has no objection to the relief sought herein.

Respectfully submitted,

By: /s/ Benjamin H. Brodsky  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this May 7, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this cases and on the Court's electronic system.

By: /s/ Benjamin H. Brodsky  
Benjamin H. Brodsky